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DEPOMED, INC. n/k/a ASSERTIO THERAPEUTICS, INC.

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16
17 NAVIGATORS SPECIALTY INSURANCE
COMPANY,

Case No. 4:19-cv-00255-HSG

18 Plaintiff and Counter-
Defendant,
19
20 v.
21 DEPOMED, INC. n/k/a ASSERTIO
THERAPEUTICS, INC.,
22
23 Defendant and
Counterclaimant.

**STIPULATED ADMINISTRATIVE
MOTION TO ENLARGE PAGE LIMITS
WITH RESPECT TO CROSS-MOTIONS
FOR PARTIAL SUMMARY
JUDGMENT; ORDER**

[LOCAL RULE 7-11]

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28 Judge: Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Local Rule 7-11, Defendant and Cross-Complainant Depomed Inc., n/k/a
2 Assertio Therapeutics, Inc. (“Depomed”) hereby moves for an order enlarging page limits with
3 respect to the parties’ forthcoming Cross-Motions for Partial Summary Judgment on the Duty to
4 Defend. This administrative motion is stipulated, as set forth on the accompanying Stipulation
5 and [Proposed] Order. The parties request:

- 6 1. That Depomed be granted ten (10) additional pages for its Motion, such that its
7 page limitation would be thirty-five (35) pages;
- 8 2. That Plaintiff Navigators Specialty Insurance Company (“Navigators”) be granted
9 ten (10) additional pages for its Response to the Motion and Cross-Motion, such
10 that its page limitation would be forty (40) pages;
- 11 3. That Depomed be granted an additional five (5) pages for its Reply in support of
12 its Motion and Opposition to Navigators’ Cross-Motion, such that its page
13 limitation would be twenty-five (25) pages; and
- 14 4. That Navigators be granted an additional five (5) pages for its Reply in support of
15 its Cross-Motion, such that its page limitation would be twenty (20) pages.

16 Good cause exists to enlarge the page limits with respect to the Cross-Motions. First,
17 because the papers will address both Depomed’s Motion and Navigators’ Cross-Motion, it is
18 appropriate and efficient for the parties to have additional pages to address all issues that are
19 raised. Second, while each party believes that the facts relevant to its Motion or Cross-Motion
20 are undisputed, the underlying facts are nevertheless complex, and concern three insurance
21 policies, 182 underlying lawsuits, construction of various policy provisions, and whether
22 Depomed provided notice to Navigators within the relevant policy periods. The additional pages
23 are requested in order to address these issues thoroughly.

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2 For the foregoing reasons, Depomed respectfully requests that the Court grant this
3 administrative motion and enlarge the parties' page limits as set forth in the accompanying
4 Stipulation and Proposed Order.

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DATED: March 11, 2020

MASLON LLP

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7 By: /s/ Margaret S. Brownell

Margaret S. Brownell

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9 Attorney for Defendant and Counter-Claimant
10 DEPOMED, INC. n/k/a ASSERTIO
11 THERAPEUTICS, INC.

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DATED: 3/12/2020



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